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Before  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20544

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Replacement of Part 90 by  
Part 88 to Revise the Private  
Land Mobile Radio Services and  
Modify the Policies Governing  
Them

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) Docket PR-92-235  
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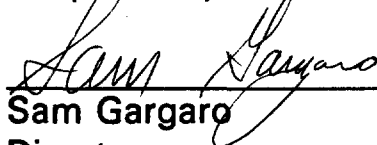
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To: The Commission

**COMMENTS OF THE STATE OF MINNESOTA**

Respectfully submitted,

  
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February 17, 1993

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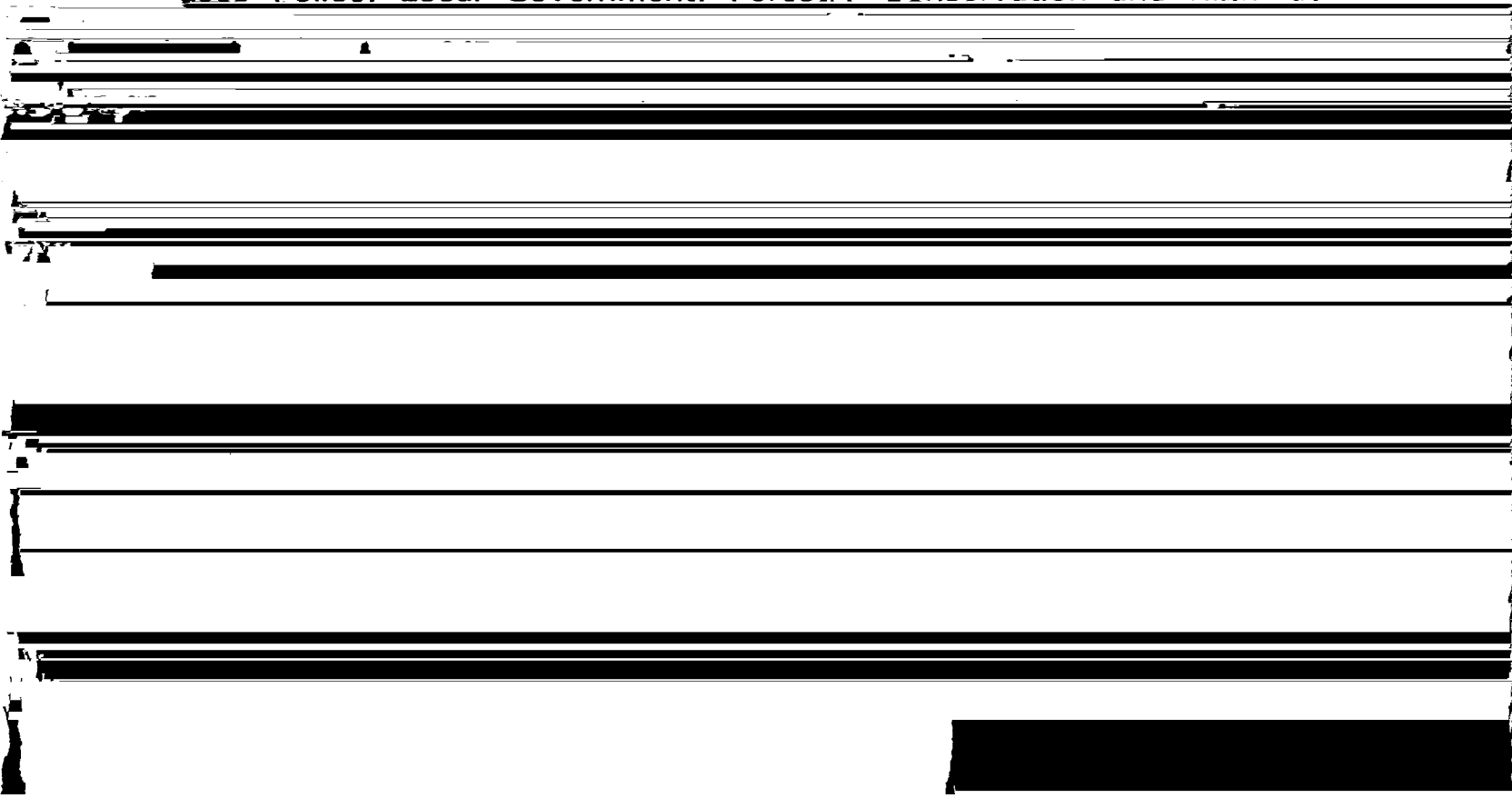
**STATE OF MINNESOTA COMMENTS CONCERNING  
FCC DOCKET 92-235**

The following are State of Minnesota comments on Federal Communications Docket PR-92-235 concerning proposed revisions to the private land mobile services rules and regulations.

The proposed rule changes directly affect the future of the State's public safety two-way radio communication. Public safety mobile communication is essential to the following State agencies.

The Department of Public Safety includes the State Patrol, Emergency Services and Bureau of Criminal Apprehension. Natural Resources includes Parks, Forestry and Enforcement. Transportation includes highway maintenance and construction.

State government public safety radio communications systems represent a substantial investment by taxpayers. These systems include over 200 base sites and over 10,000 mobiles and portables. The State currently uses Police, Local Government, Forestry Conservation and Highway



We see no reason to require Minnesota taxpayers to absorb the expense of modifying transmitters and receivers of many thousands of outstate base and mobile stations, solely as a stopgap measure for increasing assignable channels by 20% in the urban markets. We favor a direct migration to narrowband channels when appropriate equipment is available and only when present equipment has been depreciated.

~~We also propose requiring all licenses in the 150-174 MHz band to employ 5 KHz~~

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## **BANDWIDTH LIMITATIONS 88.413, TABLE C-1**

*Note 2 requires stations authorized after the effective date of the rules to meet the narrowband channel spacing and bandwidth.*

We have no assurance that equipment meeting these specifications will be available at that time. Will there be enough vendors to enable the public sector to obtain competitive bids?

## **BANDWIDTH REDUCTIONS IN THE 150-174 MHz, 421-430 MHz, & 450-470 MHz BANDS**

- (a) On the date a system must meet the spectrum efficiency standards in 88.433, a licensee keeps on channel pair per original channel assignment. Other channel pairs automatically cancel, except;*
- (b) for systems meeting the spectrum efficiency standards at 88.433 two years before the appropriate deadline, a licensee may keep up to two unloaded channel pairs;*

The rule is unclear concerning the migration of the simplex systems which are used by the State of Minnesota.

## **MUTUAL AID AND INTEROPERABILITY**

The assignment of 5 KHz channels in the 150-174 MHz band will require equipment which is not compatible with the NTIA 6.25 KHz federal government standards. State of Minnesota Department of Natural Resources equipment will be incompatible with US Forest Service. These agencies must coordinate closely during forest fires. The Bureau of Criminal Apprehension conducts daily operations with the Federal Bureau of Investigation, Alcohol, Tobacco, Firearms and Explosives, US Customs and the Drug Enforcement Administration. Interagency task forces are commonly used nationwide and require compatibility of radios.

Mutual-aid interoperability will be lost as various State and local agencies change equipment on different schedules as per 88.433. Among the mutual aid frequencies affected are;

Minnesota Statewide Emergency Frequency MINSEF (155.475 MHz)

State Patrol communicates with local police agencies

Fire Mutual Aid (154.295 MHz)

Department of Natural Resources communicates with local fire departments

#### GENERAL CATEGORY POOL 88.21

*General Category pool frequencies are available to applicants eligible for any of the private land mobile radio services including the public safety radio service, the non-commercial radio service or the specialized mobile radio service.*

It may appear that public safety is making significant channel gains by making them eligible for the general category pool. Experience with the

### **88.909 Power Limitations**

*The following power limitations apply to the frequencies listed at 88.907.*

*(c) 150.770 - 155.755 MHz. Operation on these frequencies is limited to 2 watts and a maximum antenna height of 6.1 m (20 ft.) above ground.*

Although this is a low power frequency, we believe that assignments on this channel will be a source of interference when co-located with 155.475 MHz stations. The power limitation of 88.907 is 2 watts. Is this output power or ERP?

### **RADIO CALL BOX OPERATIONS 88.1263**

*(d) Time Limitations Except for test purposes, each transmission must be limited to a maximum of two seconds and must not be repeated more than two times at spaced intervals within the following 30 seconds. Thereafter, the authorized cycle may not be reactivated for one minute.*

The provisions of 88.1263 unduly restrict the design of coded message call box systems causing inconvenience to the motorist. With the present commonly used coded message call boxes, there are four buttons to press; Police, Medical, Service and Cancel. If the motorist inadvertently presses the wrong button he will attempt to correct the problem by pressing the cancel. The cancel does not function because the call box design is restricted by the one minute provision of 88.1263. The motorist then assumes that the call box has malfunctioned.

We prefer to remove the one minute inhibit requirement because we consider it to be overly protective. If, however, the Commission has a compelling reason to keep that requirement, allow the transmission cycle to be repeated at least three times before requiring the one minute inhibit. This allows the motorist to press the call cancel followed by a corrected call without any regulatory imposed delay.

Protect call box systems operating in the 72-76 MHz band by requiring any new applicants on the call box frequency to be assigned the channel on a secondary basis. The State has a substantial investment in motorist aid call boxes which could be jeopardized by a new co-channel licensee.

## **FREQUENCY COORDINATION 88.305**

Coordinators do not share a common database. A common database will provide:

- Critical frequency assignment information that is not now available in real time.
- Official date and time stamp of an application.
- Technical parameters such as antenna characteristics and CTCSS.

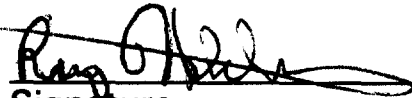
## **APCO AND AASHTO COMMENTS**

The State supports Part 88 comments submitted by the Associated Public Safety Communications Officers (APCO) and American Association of State Highway Transportation Officials (AASHTO).

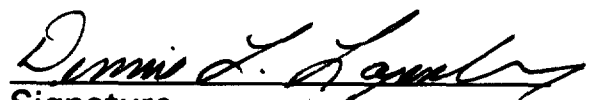
Darryl Durgin  
Deputy Commissioner  
Minnesota Department of Transportation

  
Signature

Ray Hitchcock  
Assistant Commissioner  
Department of Natural Resources

  
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Col. Dennis Lazenberry  
Acting Chief  
Minnesota State Patrol

  
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